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6 California, Christopher Coronel, Rameen
Talesh, Janet Nava Cardenas, Kirsten
7 Quanbeck, Dr. Manny Tau, Anh Pham,
John Gherini
8

9 **UNITED STATES DISTRICT COURT**
10 **CENTRAL DISTRICT OF CALIFORNIA**

11
12 Robert V. Gonzales,

13 Plaintiff,

14 v.

15 The Regents of the University of
California et al.,

16 Defendants.
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CASE NO. 8:23-CV-01788-JVS(KESx)

**DECLARATION OF RAYMOND A.
CARDOZO IN SUPPORT OF
COMBINED MOTION TO DISMISS
CONSOLIDATED THIRD
AMENDED COMPLAINT AND FOR
PROTECTIVE ORDER**

Hearing Date: August 11, 2025
Time: 1:30 p.m.
Dept.: 10C
Judge: Hon. James Selna

*[Filed concurrently with Notice of
Motion and Motion to Dismiss;
[Proposed] Order]*

REED SMITH LLP
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DECLARATION OF RAYMOND A. CARDOZO

I, Raymond A. Cardozo, declare as follows:

1. I am an attorney duly admitted to practice before this Court. I am a partner at Reed Smith LLP, counsel of record for Defendants The Regents of the University of California, Kirsten Quanbeck, Ahn Pham, and John Gherini.

2. I make this declaration in support of Defendants' Combined Motion to Dismiss Plaintiff's Consolidated Third Amended Complaint and for Protective Order. I have personal knowledge of the facts set forth in this declaration and if called as a witness, I could and would testify competently to each fact herein.

3. Following this Court's dismissal of Plaintiff's Second Amended Complaint on September 30, 2024, Plaintiff continued to contact counsel for The Regents and University personnel via email and phone to discuss meeting and conferring about his contentions, and settlement. On January 24, 2025 and January 27, 2025, counsel for The Regents explained to Plaintiff that The Regents was not under an obligation to engage in meet and confer or settlement efforts, as the Court had rejected Plaintiff's contentions. A true and correct copy of this email chain is attached hereto as **Exhibit 1**.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on this 23rd day of June of 2025, in San Francisco, California.

/s/ Raymond A. Cardozo
Raymond A. Cardozo

EXHIBIT 1

Subject: FW: Voicemail

From: Cardozo, Raymond <RCardozo@ReedSmith.com>
Sent: Wednesday, March 12, 2025 1:43 PM
To: bobby gonzales <bgfarcenter@gmail.com>; Fierro, Corinne <CFierro@reedsmith.com>
Subject: RE: Voicemail

Mr. Gonzales,

I have repeatedly instructed you to not communicate directly with Mr. Gherini or anyone else at UC about your legal contentions, that we represent all such individuals, and that you should therefore send all such communications only to me and my firm. You need to stop violating that instruction, or UC will take action in response.

Raymond A. Cardozo
He/His

rcardozo@reedsmith.com
D: 415 659 5990
reedsmith.com

From: bobby gonzales <bgfarcenter@gmail.com>
Sent: Tuesday, March 11, 2025 12:37 PM
To: Cardozo, Raymond <RCardozo@ReedSmith.com>; Fierro, Corinne <CFierro@reedsmith.com>;
john.gherini@ucop.edu
Subject: Re: Voicemail

External E-Mail - FROM bobby gonzales <bgfarcenter@gmail.com>



This message needs your attention

- This is a personal email address.


Report or Mark Safe


Powered by Mimecast

Please read.



On Tue, Mar 4, 2025 at 1:28 PM bobby gonzales <bgfarcenter@gmail.com> wrote:

Did anyone read the appeal document stating that the case is not dismissed?

 [_#128 A\(1-12\).pdf](#)

 [_#129 B\(1-13\).pdf](#)

 [_#130 C\(1-3\).pdf](#)

 [2-28 CV-4F Evidence.pdf](#) [2-28 CV-4F Irreparable.pdf](#) [2-28 CV-4F Records.pdf](#)

On Fri, Jan 31, 2025 at 10:55 AM bobby gonzales <bgfarcenter@gmail.com> wrote:

On Fri, Jan 31, 2025 at 12:21 AM bobby gonzales <bgfarcenter@gmail.com> wrote:

On October 27th of 2024, I filed my third amended complaint. On November 19th of 2024, the District Court indicated that my third amended complaint is a "denied motion." On December 18th of 2024, the 9th Circuit Court ruled that my third amended complaint is "**STILL PENDING**" despite the District Court's ruling one month beforehand, because of the use of the language "denied motion." As put in Dist. Doc. #120, the District Court is lacking in jurisdiction over matters which are under the jurisdiction of a higher court according to the Federal Rules of Civil Procedure, and the 9th Circuit Court has ruled that my case is not dismissed and that my latest amended complaint is still pending, *after the District Court had its [void] say*.

In my state of focus and motivation following 11 years of my academic and free time suspended in waste, your avoidance and manipulations demonstrated throughout my appeal and docket of record is detrimental to my **HEALTH**. The District Court has repeatedly avoided all of my motions throughout the entirety of my case until suddenly labeling them as "redundant" in Dist. Doc. #120 (*Doc. #32 pg 6*). The District Court has also repeatedly avoided the facts of the case in four attempts at adjudicating the complaint as well as the elements of my standing to federal jurisdiction which include due process claims, irreparable injury under *US v. Carroll Towing (159 F.2d 169, 1947)*, and exhaustion of judicial remedies under *Steffel v. Thompson (415 U.S. 454, 1974)*. If you'll remember, or if you even noticed, the dismissal in Dist. Doc. #67 was entirely based on a subject matter I had removed from my case *very early on* in Dist. Doc. #16, while the ruling totally avoided every other topic that was actively being claimed. The District Court denied an exemplary motion to waive fees, and now I am almost broke (*Doc. #32 pg. 8-9*) even though I have unsuccessfully applied to more than 200 jobs as demonstrated in Dist. Docs. 98 & 121. Judge Selna has demonstrated no consideration for the compounded stresses to repeatedly navigate the professional dynamics of avoidance in

litigation, imposed on an undergrad student already in years of duress. *When I can avoid printer ink to make a complaint to the 9th Circuit Judicial Council, Judge Selna will be in hot water.* Alongside the same avoidant omissions, you have adopted an omitted “understanding” of case “information” such as the relevance of my argument in Doc. #27, against FRCP 11(b)(4) as well as FRCP 8(b)(2) and FRCP 8(b)(5). Now, you are using the “denied motion” as an excuse to continue avoiding case materials, refusing to schedule court-ordered conferences in an attempt to fatigue me once again, and ignore me even though the higher court has ruled that the schedule in Dist. Doc. #94 is still effective.

After more than one year of repeatedly repeating case facts omitted only by so many possible explanations which I have also repeatedly proved, after 11 years of my life's sacrifices, I no longer have the ability to focus enough to grasp much of anything I have tried to read lately, think straight, *or perform too many daily functions of life in common-sense order without forgetting steps*. According to the laws of the State of NV and probably other States, I have been made a "vulnerable person" by official university actions, and you. You intend to attempt to win a case at the expense of immense works that could be put to use in the favor of the University of California, and at the expense of **HUMAN LIFE** as I indicated in court documents.

A permanent term of disciplinary probation violates UC "Policies Applying to Campus Activities, Organizations, and Students" **105.03**, and assigning me disciplinary probation "for the duration of my academic enrollment" disqualifies me from the financial aid that enables my academic enrollment in the first place. I spent most of my academic and free time working towards qualifying for the financial aid, but this unofficial, effective dismissal shows that I am being treated like the opposite kind of character from someone who spent their entire young-adult life developing gigabytes of research outlines, project plans, and corresponding data.

After applying to more than 200 mostly low-level jobs over the last two years as *directly claimed in the lawsuit*, I am almost completely broke now. Being nearly broke, unable to obtain employment, and severely lacking in focus and motivation, I cannot effectively form and maintain a 501(c)(3) to "just start over, it's easy." Without a 501(c)(3), I do not qualify for almost any grant funding opportunities. *Destroying a party's function of life before trial is not a credible defense strategy*. Below is a list of too many universal project plans being put to waste by official university actions that were negligent per se and more.

[illegible]

1. The first plan I ever drafted is to cover every square inch of **realistic** developed space in road-quality solar panels in combination with Tesla decentralized “powerpack” batteries.
2. I used to outline many legal framework proposals based on current events. The issues include lethal force by police officers, community-oriented policing with a “community security strategies” twist, local revenue generation, reconstruction of my local City code, reconstruction of tax codes **with a write-off system that everyone can understand and love**, and constitutional amendments.
3. I drafted hundreds of pages of potential “drain both swamps” speeches for political candidates based on the widespread dissatisfaction with insider government traditions that can get someone like Donald Trump elected, even if he is keeping the bar for substance on “**violent, harmful, and corrupt**” injustice nearly as low as powerful insiders.
4. I consolidated ideas from my draft speeches in order to develop a YouTube influencer framework to inform viewers about **the most powerful scientific information on Earth**. The major topics include law, psychology, anthropology, physics, biology, technology, and economics.
5. I have formed hypotheses about where ancient artifacts which would support too many existing hypotheses and hypotheses of my own may be found one day when such projects are funded. The topics in question include the timelines of the Mediterranean Sea and the Persian Gulf, the true beginnings of agriculture and civilization, the populating of the Americas, the mythology of cultures around the world, and many **popular mythical topics**.
6. I outlined a joint fraternity-sorority framework that would, among other objectives like electoral campaigning, enable nonprofits which are working separately on the same objectives to departmentalize and **work together** towards the combined, intended goals.
7. Inspired by my Discovery research project, I developed a framework for class-action/consulting that knows how to **generate revenue where most law firms don’t**.
8. I have developed several **job-creation** business plans for marginalized groups and rural communities for a variety of creative ideas such as car sales, auto parts, housing development, fuel-efficient technology, solar energy, wholesaling, and more.
9. I outlined a major plan to give drug-cartel participants a new start in their countries by **earning** their way into an industrial works program beneficial to the continental economy.
10. I engineered a brief affordable housing development plan with cost-efficiency “**that blows the cost figures of all other plans out of the water**” by a huge margin according to 3 LA County officials.
11. Since as far back as my solar power plan, I have known of 1930s “100mpg tech” that is still waiting to be improved. Therefore, I idealized a joint plan between several auto manufacturers to compete with the **wastefulness** still seen in the industry today.
12. Mostly just an idea at this time, but for years I have developed some slight hypotheses as to how laser technology can be improved. The answers may have a little to do with my project and plan related to existing astronomical theories that have been **expanding** on general and special relativity, quantum mechanics, and Carl Sagan's mathematical constants in the last 30 years.
13. After conducting a brief 101 research project in 2024 on granitic rocks that has **outlined major research** on mineralogy in general, I have drafted this brief plan for mining precious metals/rare earths in Mother Lode and Comstock Lode mining districts.

*14. Since middle school, I have spent time studying the basics of plant medicine, and many friends I have met over the years are interested in the topic of **wholistic medicine** enough to form a network to bring a plan to life that competes with the dangers of pharmaceutical drugs.*

On Mon, Jan 27, 2025 at 11:08 AM bobby gonzales <bgfarcenter@gmail.com> wrote:

You are mistaken. The newest amended complaint has not been ruled upon, so the conference scheduled by the court and all of the other dates are still effective. More evidence of everything I have already proven.

I will be the one giving you instructions from now on. Don't implicitly threaten me with bullshit!

On Mon, Jan 27, 2025 at 10:52 AM Cardozo, Raymond <RCardozo@reedsmith.com> wrote:

First, I understand that you have violated my clear instruction to you that you must direct your communications to me and my firm only, and must not contact University personnel directly. I am told that despite that clear instruction, you bcced University personnel on your email to me. That must stop and not happen again.

Second, The Regents is not obligated to engage in a settlement conference or to discuss settlement. The courts have rejected your contentions. If The Regents chooses to do anything other than simply rest on the existing court rulings or respond via submissions to the court, you will hear from me.

Raymond A. Cardozo

He/His

rcardozo@reedsmith.com

D: 415 659 5990

reedsmith.com

From: bobby gonzales <bgfarcenter@gmail.com>
Sent: Sunday, January 26, 2025 11:40 PM
To: Cardozo, Raymond <RCardozo@ReedSmith.com>
Subject: Re: Voicemail

External E-Mail - FROM bobby gonzales <bgfarcenter@gmail.com>

"If you choose" to respond to arranging a court ordered settlement conference... which you have been choosing not to.

You've already chosen not to respond to case information. Nor try to understand it. And ignore me for months. How long are you asking me to wait?

Why would anyone listen to a demand like that? That sounds like you are choosing not to do the job that the Regents have hired you to do. I don't have to wait for you to not do your job, at the expense of my stress and brain cells.

I've already been steeping in my 200 job applications and my own thoughts for long enough. Do you understand what you are asking of me?

On Fri, Jan 24, 2025 at 1:15 PM Cardozo, Raymond <RCardozo@reedsmith.com> wrote:

Mr. Gonzales,

First, I and Corrine represent the University with regard to your legal contentions. You need to direct any communications about your legal contentions to us, rather than all the voicemails and other communications you have been sending to other University personnel.

Second, we are aware of your contentions. If we choose to respond, you will hear from us. Continuing to reiterate your points in seriatim emails and voicemails is not effective.

Raymond A. Cardozo

He/His

rcardozo@reedsmith.com

D: 415 659 5990

reedsmith.com

From: bobby gonzales <bgfarcenter@gmail.com>

Sent: Friday, January 24, 2025 1:01 PM

To: john.gherini@ucop.edu; Cardozo, Raymond <RCardozo@ReedSmith.com>; Fierro, Corinne <CFierro@reedsmith.com>

Subject: Re: Voicemail

External E-Mail - FROM bobby gonzales <bgfarcenter@gmail.com>

I have been assigned a permanent disciplinary probation against Regents policy that disqualifies me from the financial aid I spent my entire young-adult life working towards after an unusually-lengthy suspension. Such lawbreaking and irreparable injury is not "unquestionable." I have been unemployed for two years and am now almost broke even after submitting 200 job applications all over. Breach of a specific duty of care related to student safety in dorm housing has caused irreparable damage to 11 years of my life's academic and free time spent preparing to qualify for UC financial aid and a future career. While most students are not so independently motivated to prepare for a career in their free time as I am, so-called unquestionable university lawbreaking has damaged the focus, motivation, and half of a life's time of someone with my potential by treating my life's work in ways that are traditionally used against troublemakers. With my **gigabytes of research outlines, project plans, and corresponding data**, you are going way out of your way to pick on the wrong individual with the most absurd legal defenses. 11 years of academic and free time spent preparing to build a future which university politics has irreparably damaged is not the same as most [post-graduation] unemployment stories. Someone with my potential does not deserve injustices that human nature reserves for the opposite character traits in general, at all!

I have been wrongly accused of A) providing "no" evidence in the face of direct communications with wrongdoers about their wrongdoings in real time, authentic records, and more; B) claiming "zero" federal injuries in the face of an obvious **due process** claim as well as the **irreparable injuries** and a totally-avoided, perfect precedent for **normal exhaustion requirements** in a case like mine; and C) lack of competency by means of total and overt avoidance of case substance. You have asserted that the absurdly long list of policies broken to cause irreparable damage to my life's time and every worldly objective which it may extend to in the future is "unquestionable." I do not deserve any of this, I should be working on putting my life's efforts to help the helpless to use.

I just want to start moving forward with my life's now-overexerted objectives and efforts. I **barely have the focus to read, think straight, or perform basic daily activities anymore**. There are more overlooked, forgotten, avoided details I could repeat some more, many times over, but doing so is pretty difficult with compounding loss of focus and motivation. The defense strategy to omit, distort, and avoid "understanding" case "information" is wilful, knowing destruction of my sacrifices of effort to studiously prepare for a career to help the helpless, my entire young-adult life, and my bottom-function abilities to function enough in daily life to perform basic tasks with enough common sense not to forget steps. Does the university intend to win cases at the expense of immense works that could be used for its own benefit, and of human life?! **What does nature reserve for such "unquestionable" deeds of human sacrifice?**

Destroying a party's function in life before trial is not a credible defense strategy. Let's get this over with by allowing me to have my brain and more back. I am not just another student who would just study, party, and move on, not even close. I can prove many times over that settling this case nicely will constitute a ***win-win outcome*** with the skills and ideas I originally planned to bring to the University of California. If you have any questions, please ask. Please email me back or call me at 530-523-3822.

On Wed, Jan 22, 2025 at 11:23 PM bobby gonzales <bgfarcenter@gmail.com> wrote:

Are you ready to start discussing moving forward so I can focus enough to function enough in everyday life again?

On Mon, Dec 11, 2023, 4:39 PM bobby gonzales <bgfarcenter@gmail.com> wrote:

Hi, this is Bobby Gonzales.

I left a voicemail today to ask when you will be available to hold a discovery conference.

Here is an email just in case you prefer communicating by email.

This E-mail, along with any attachments, is considered confidential and may well be legally privileged. If you have received it in error, you are on notice of its status. Please notify us immediately by reply e-mail and then delete this message from your system. Please do not copy it or use it for any purposes, or disclose its contents to any other person. Thank you for your cooperation.

RSUSv12021